



December 20, 2024

Office of Planning and Community Development  
*Submitted via email to [oneseattleplan.zoning@seattle.gov](mailto:oneseattleplan.zoning@seattle.gov)*

**RE: Birds Connect Seattle comments on draft One Seattle Plan Zoning Update**

Dear Office of Planning and Community Development,

Hello from Birds Connect Seattle, Seattle's local bird conservation organization since 1916. We envision cities that value and integrate nature, protect habitat, and minimize hazards to birds.

Birds Connect Seattle acknowledges the urgent need for affordable housing and to address the harm caused by prejudicial and exclusionary zoning policies. It is our intention with these comments to contribute to a more inclusive, just, and affordable city by calling attention to potential impacts of the proposed zoning update that may exacerbate environmental injustices, unduly harm wildlife, disrupt urban ecosystems, and commit Seattle to a hotter, sicker, and less resilient future.

**The proposed zoning changes will increase the rate of tree removal and increase the extent of impervious surfaces across the city.** The proposed mitigations will not be sufficient to reach our canopy goals and provide redress for historical and ongoing canopy cover inequities, even in addition to existing policies and programs.

**Birds Connect Seattle makes the following recommendations and requests:**

1. Increase amenity / open space requirements for lower density projects, require that 100% of amenity area to be at ground level and require at least 50% of amenity area to be contiguous permeable/plantable area where natural processes like water infiltration, plant growth, and nutrient cycling can occur.
2. Please describe how the tree point system was developed and a rationale for tree requirements per lot area.
3. Update tree point system to include points for protecting existing healthy smaller-diameter trees that have potential to grow our urban forest.
4. Establish a new designation for Ecological Connectivity Overlay Zones to support high-impact, strategic urban greening and wildlife connectivity between important urban habitat areas.

**Please see our full comments on the following pages.**

### **Rationale for asserting the proposed zoning changes will increase tree removal**

In 2021, Neighborhood Residential (NR) zones contributed 47% of the city's overall tree canopy cover, more than any other single management unit [1].

The proposed zoning changes on NR zones increase the allowed lot coverage from 35% to 50%. Increasing lot coverage will require greater tree removal on average to achieve the larger development potential. While the proposal would establish a new point-based tree planting requirement system, modeling results shared with the Urban Forestry Commission suggest the tree points would result in between tree canopy cover of 19-26% on redeveloped parcels after 25 years [2]. This is well below the current NR average of 34% canopy cover [1].

### **Comments on 23.44.022 Amenity Area**

Increased lot coverage allowed by the zoning updates is likely to increase tree removal and the extent of impervious surfaces across the city. A minimum amenity area requirement could be a good tool for preserving permeable surfaces and plantable space for trees. However, the proposal weakens itself by setting a 20% minimum for all development projects, no matter proposed structural density; by allowing 50% of the amenity area to be located above grade (e.g., on rooftops); allowing hot tubs, swimming pools and decks to count as amenity areas; and making no requirement that the open space be contiguous.

The proposal could be improved by requiring a range of minimum open space requirements depending on density, with a floor of 20% and higher requirements—30% or 40% for example—for lower density projects. Birds Connect Seattle further recommends that 100% of the amenity area to be at ground level. We also recommend adding a requirement that 50% of the required amenity area be contiguous, permeable/plantable space where natural processes like water infiltration, plant growth, and nutrient cycling can occur.

**RECOMMENDATION: Increase amenity / open space requirements for lower density projects, require that 100% of amenity area to be at ground level and require at least 50% of amenity area to be contiguous permeable/plantable area where natural processes like water infiltration, plant growth, and nutrient cycling can occur.**

### **Comments on 23.44.024 Tree Requirements**

The proposed tree planting requirement point system provides better incentivizes for tree protection and planting of conifer and larger stature trees than the current caliper inch-based system that treats all plantings equally (e.g., a 2"-caliper Japanese Maple is "worth" the same as a 2"-caliper Giant Sequoia).

However, it is unclear how this point system was developed, and by what parameters it is bounded. Was the system designed by arborists, with the tree points limited by the expected plantable space given the proposed lot coverage updates? Or was it developed around developers' expectations? A description of the rationale for the requirements would be helpful to understanding if the mitigations are making best use of this opportunity to add trees during development.

**REQUEST: Please describe how the tree point system was developed and a rationale for tree requirements per lot area.**

We note that the point system overlooks a significant component of our urban forest, namely existing healthy trees less than six inches in diameter. A five-inch diameter healthy Douglas Fir, for example, could be well established with good survivability prospects, fewer costs and maintenance requirements than a new planting, and could contribute greatly to our future urban forest. We recommend that the point system be updated to include points for preserving smaller-diameter trees.

**RECOMMENDATION: Update tree point system to include points for protecting existing healthy smaller-diameter trees that have potential to grow our urban forest.**

### **Zoning to support ecological connectivity and urban biodiversity**

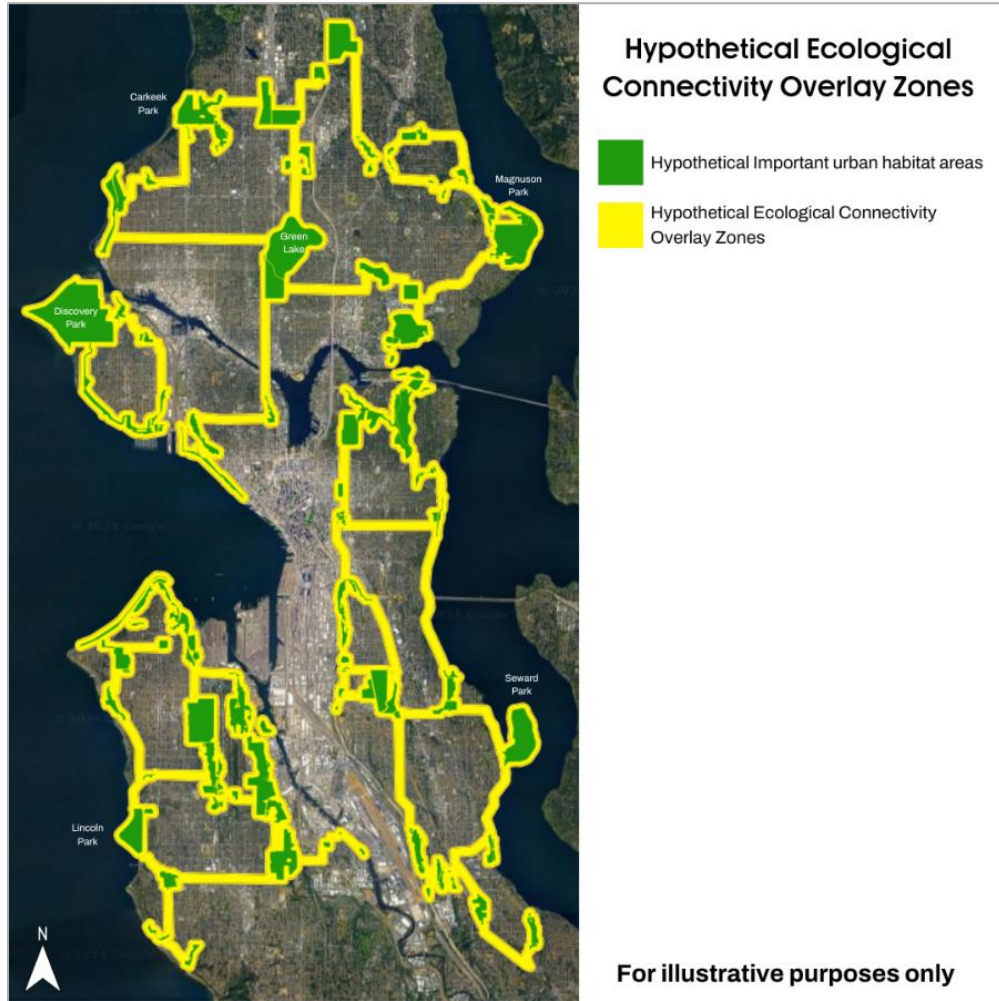
Ecological connectivity is critical for biodiversity conservation [3]. Ecological corridors allow wildlife to move between habitat patches to access resources, support seasonal migrations, and facilitate geneflow by linking populations. Methods for assessing urban ecological connectivity have been developed and proposed as a planning tool for urban wildlife conservation [4].

We have an opportunity in this Comprehensive Update process to use zoning to strategically plan for additional tree preservation, tree planting, de-paving, urban greening, and other forms of urban landscape softening where it will have the greatest impact for people, birds, and all the other life with which we share our city.

We recommend the City study and establish a new zoning designation or incentive zoning program for Ecological Connectivity Overlay Zones. Ecological Connectivity Overlay Zones would buffer and connect important urban habitat areas. New development in Ecological Connectivity Overlay Zones would be required or incentivized to maximize tree preservation and planting; meet higher permeable surface and open space requirements; conform to bird-safe design and materials standards; use wildlife-friendly fencing; etc. Density could be limited in particularly sensitive areas and land acquisition for new public parks could be prioritized within Ecological Connectivity Overlay Zones. See the figure on the following page for a hypothetical visual example.

Ecological Connectivity Overlay Zones could also help ensure that trees canopy, vegetation, and wildlife remain present and valued right in people's neighborhoods and not relegated to increasingly isolated habitat fragments in public parks. These overlay zones can be designed to address canopy and other environmental inequities. The ecological network this could create would have significant benefits for people, too, by improving public life, promoting outdoor activity, fostering experiences with urban nature, and helping people find their way between Seattle's greenspaces.

**RECOMMENDATION: Establish a new designation for Ecological Connectivity Overlay Zones to support high-impact, strategic urban greening and wildlife connectivity between important urban habitat areas.**



Birds Connect Seattle is happy to serve the City as a resource on birds and urban conservation. Do not hesitate to contact us with questions or for more information.

Sincerely,

**Joshua Morris**  
Urban Conservation Manager

Cc: Mayor Bruce Harrell: [bruce.harrell@seattle.gov](mailto:bruce.harrell@seattle.gov)  
Seattle City Council: [council@seattle.gov](mailto:council@seattle.gov)

### Literature Cited

- [1] City of Seattle Office of Sustainability and Environment, "2021 City of Seattle Tree Canopy Assessment," Seattle, Washington, Technical report, 2023. [Online]. Available: [https://seattle.gov/documents/Departments/OSE/Urban%20Forestry/2021%20Tree%20Canopy%20Assessment%20Report\\_FINAL\\_230227.pdf](https://seattle.gov/documents/Departments/OSE/Urban%20Forestry/2021%20Tree%20Canopy%20Assessment%20Report_FINAL_230227.pdf)
- [2] B. Staley, "Mayor Harrell's One Seattle Plan Comprehensive Plan Update: Zoning Update," presented at the Meeting of Seattle's Urban Forestry Commission, Seattle, WA, Nov. 13, 2024. [Online]. Available: <https://www.seattle.gov/documents/Departments/UrbanForestryCommission/2024/2024Docs/One%20Seattle%20Plan%20Zoning%20Update%20-%20UFC%20presentation.pdf>
- [3] R. Ament, R. Callahan, M. McClure, M. Reuling, and G. Tabor, "Wildlife Connectivity: Fundamentals for Conservation Action," Center for Large Landscape Conservation, Bozeman, MT, 2014.
- [4] H. Kirk *et al.*, "Ecological connectivity as a planning tool for the conservation of wildlife in cities," *MethodsX*, vol. 10, p. 101989, Jan. 2023, doi: 10.1016/j.mex.2022.101989.